

**Gina Flores**

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**From:** Joshua Lang  
**Sent:** Monday, December 23, 2024 11:11 PM  
**To:** Sheasby, Jason  
**Cc:** Love Greg; David Perlson; Chelsea Till; Proctor, Amy; Stickney Judge Paul; Deepa Acharya; Michael K. Hurst  
**Subject:** RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

[EXTERNAL EMAIL from [jlang@lynnllp.com](mailto:jlang@lynnllp.com)]



Counsel,

We do not understand. We agreed to the compromise extension you offered. We have agreed to provide reasonable, professional courtesy for extensions in the future. To the extent that you are asking that Google agree that Valtrus will get a two week extension to the next two motions that Google files on any issue, on any subject matter, at any time, and regardless of urgency of need of resolution of said presently unknown motion, then Google cannot agree and will file an opposed motion seeking expedited relief noting your unreasonable position.

Thank you,  
Josh

--

**JOSHUA D. LANG**, Attorney  
**Lynn Pinker Hurst & Schwegmann, LLP**  
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Dallas, Texas 75201  
[lynnllp.com](http://lynnllp.com)

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**From:** Sheasby, Jason <JSheasby@irell.com>

**Sent:** Monday, December 23, 2024 9:48 PM

**To:** Joshua Lang <jlang@lynnllp.com>

**Cc:** Love Greg <Greg@stecklerlaw.com>; Perlson David <davidperlson@quinnemanuel.com>; Chelsea Till <ctill@lynnllp.com>; Proctor, Amy <AProctor@irell.com>; Stickney Judge Paul <judgestickney@stecklerlaw.com>; Love Greg <Greg@stecklerlaw.com>; Perlson David <davidperlson@quinnemanuel.com>; Chelsea Till <ctill@lynnllp.com>; Proctor, Amy <AProctor@irell.com>; Stickney Judge Paul <judgestickney@stecklerlaw.com>

**Subject:** Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

josh.

Our position is in Greg's email.

Best

JS

On Dec 23, 2024, at 7:43 PM, Joshua Lang <jlang@lynnllp.com> wrote:

Greg,

Thank you. We will file the motions as unopposed seeking the following extensions as you proposed earlier today. And yes, of course, we intend to be reasonable and provide professional courtesy as you have here going forward.

2. As to your request for an extension on the response to the motions to consolidate in Valtrus I and II, and Valtrus' Motion to Amend the Complaint in Valtrus I, Valtrus is willing to not oppose an extension from January 8th to January 22nd so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

3. Valtrus is willing to not oppose an extension from January 2nd to January 16th for Google's response to the Amended complaint in Valtrus II so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

Thank you,

Josh

--

JOSHUA D. LANG, Attorney

Lynn Pinker Hurst & Schwegmann, LLP

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lynnllp.com<<https://url.us.m.mimecastprotect.com/s/xg3wCxklyPIxoRAOUvhBlyqWRf/>>

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From: Greg Love <[Greg@stecklerlaw.com](mailto:Greg@stecklerlaw.com)>  
Sent: Monday, December 23, 2024 9:09 PM  
To: Joshua Lang <[jlang@lynnllp.com](mailto:jlang@lynnllp.com)>  
Cc: David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)>; Chelsea Till <[ctill@lynnllp.com](mailto:ctill@lynnllp.com)>; Jason Sheasby <[JSheasby@irell.com](mailto:JSheasby@irell.com)>; Proctor, Amy <[AProctor@irell.com](mailto:AProctor@irell.com)>; Judge Paul Stickney <[judgetickney@stecklerlaw.com](mailto:judgetickney@stecklerlaw.com)>  
Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Josh-

As to your request for an extension on the response to the motions to consolidate in Valtrus I and II, and Valtrus' Motion to Amend the Complaint in Valtrus I, Valtrus is willing to not oppose an extension from January 8th to January 22nd so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II and Google agrees to a similar courtesy the next time it files a motion.

Valtrus is willing to not oppose an extension from January 2nd to January 16th for Google's response to the Amended complaint in Valtrus II so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II and Google agrees to a similar courtesy the next time it files a motion.

Greg Love  
Steckler Wayne & Love PLLC  
East Texas Office  
903.212.4444

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From: Joshua Lang <[jlang@lynnllp.com](mailto:jlang@lynnllp.com)<<mailto:jlang@lynnllp.com>>>  
Sent: Monday, December 23, 2024 8:40 PM  
To: Greg Love <[Greg@stecklerlaw.com](mailto:Greg@stecklerlaw.com)<<mailto:Greg@stecklerlaw.com>>>  
Cc: David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)<<mailto:davidperlson@quinnemanuel.com>>>; Chelsea Till <[ctill@lynnllp.com](mailto:ctill@lynnllp.com)<<mailto:ctill@lynnllp.com>>>  
Subject: FW: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Hi Greg,

We took a closer look at Jason's email below, and it appears to us that Jason is suggesting that our proposed extensions are unopposed on the conditions listed below in my email. Of course, we intend to be reasonable and provide professional courtesy as you have here going forward.

Can you please confirm with Jason Sheasby?

Conditions to Unopposed Motions to Continue:

As to your request for an extension on the response to the motions to consolidate in Valtrus I and II, and Valtrus' Motion to Amend the Complaint in Valtrus I, Valtrus is willing to not oppose an extension from January 8th to January 22nd so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

Valtrus is willing to not oppose an extension from January 2nd to January 16th for Google's response to the Amended complaint in Valtrus II so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

--

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From: Sheasby, Jason <[JSheasby@irell.com](mailto:JSheasby@irell.com)<<mailto:JSheasby@irell.com>>>  
Sent: Monday, December 23, 2024 7:52 PM  
To: David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)<<mailto:davidperlson@quinnemanuel.com>>>; Chelsea Till <[ctill@lynnllp.com](mailto:ctill@lynnllp.com)<<mailto:ctill@lynnllp.com>>>; Joshua Lang <[jlang@lynnllp.com](mailto:jlang@lynnllp.com)<<mailto:jlang@lynnllp.com>>>  
Cc: Love Greg <[Greg@stecklerlaw.com](mailto:Greg@stecklerlaw.com)<<mailto:Greg@stecklerlaw.com>>>; Proctor, Amy <[AProctor@irell.com](mailto:AProctor@irell.com)<<mailto:AProctor@irell.com>>>; Michael K. Hurst <[MHurst@lynnllp.com](mailto:MHurst@lynnllp.com)<<mailto:MHurst@lynnllp.com>>>; He-Schaefer, Connor <[che-schaefer@irell.com](mailto:che-schaefer@irell.com)<<mailto:che-schaefer@irell.com>>>; Julia Simon <[jsimon@lynnllp.com](mailto:jsimon@lynnllp.com)<<mailto:jsimon@lynnllp.com>>>; Tonia Ashworth

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Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

To be clear, we don't oppose your extensions at all on the stipulations below we just ask for the same courtesy when you file motions against us.

From: Jason Sheasby <JSheasby@irell.com<mailto:JSheasby@irell.com>>

Date: Monday, December 23, 2024 at 3:55 PM

To: David Perlson <davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com>>, Chelsea Till <ctill@lynnllp.com<mailto:ctill@lynnllp.com>>, Joshua Lang <jlang@lynnllp.com<mailto:jlang@lynnllp.com>>

Cc: Love Greg <Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com>>, "Proctor, Amy" <AProctor@irell.com<mailto:AProctor@irell.com>>, "Michael K. Hurst" <MHurst@lynnllp.com<mailto:MHurst@lynnllp.com>>, "He-Schaefer, Connor" <che-schaefer@irell.com<mailto:che-schaefer@irell.com>>, Julia Simon <jsimon@lynnllp.com<mailto:jsimon@lynnllp.com>>, Tonia Ashworth <TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com>>, QE-Valtrus <qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com>>, Stickney Judge Paul <judgetickney@stecklerlaw.com<mailto:judgetickney@stecklerlaw.com>>, "#Valtrus-Google [Int]" <Valtrus-Google@irell.com<mailto:Valtrus-Google@irell.com>>, Gina Flores <gflores@lynnllp.com<mailto:gflores@lynnllp.com>>, Haihang Wang <haihangwang@quinnemanuel.com<mailto:haihangwang@quinnemanuel.com>>, Love Greg <Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com>>, "Proctor, Amy" <AProctor@irell.com<mailto:AProctor@irell.com>>, "Michael K. Hurst" <MHurst@lynnllp.com<mailto:MHurst@lynnllp.com>>, "He-Schaefer, Connor" <che-schaefer@irell.com<mailto:che-schaefer@irell.com>>, Julia Simon <jsimon@lynnllp.com<mailto:jsimon@lynnllp.com>>, Tonia Ashworth <TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com>>, Stickney Judge Paul <judgetickney@stecklerlaw.com<mailto:judgetickney@stecklerlaw.com>>, "#Valtrus-Google [Int]" <Valtrus-Google@irell.com<mailto:Valtrus-Google@irell.com>>, Gina Flores <gflores@lynnllp.com<mailto:gflores@lynnllp.com>>, Haihang Wang <haihangwang@quinnemanuel.com<mailto:haihangwang@quinnemanuel.com>>

Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

David:

There was no confusion. The purpose of this request was to avoid a tactic you have employed in the past.

1. Seek a delay of our motion being briefed
2. File your own motion.
3. Refuse to give us an extension on your motion.

Thanks

JS

From: David Perlson <[davidperlson@quinnemanuel.com](mailto:davidperlson@quinnemanuel.com)<<mailto:davidperlson@quinnemanuel.com>>>

Date: Monday, December 23, 2024 at 3:54 PM

To: Chelsea Till <[ctill@lynnllp.com](mailto:ctill@lynnllp.com)<<mailto:ctill@lynnllp.com>>>, Jason Sheasby

<[JSheasby@irell.com](mailto:JSheasby@irell.com)<<mailto:JSheasby@irell.com>>>, Joshua Lang

<[jlang@lynnllp.com](mailto:jlang@lynnllp.com)<<mailto:jlang@lynnllp.com>>>

Cc: Love Greg <[Greg@stecklerlaw.com](mailto:Greg@stecklerlaw.com)<<mailto:Greg@stecklerlaw.com>>>, "Proctor, Amy"

<[AProctor@irell.com](mailto:AProctor@irell.com)<<mailto:AProctor@irell.com>>>, "Michael K. Hurst"

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Subject: RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Counsel, I think there may have been some confusion here. We agree to commensurate extensions on the oppositions/ replies that relate to the motions at issue in our extension request, but not on unknown motions that may happen in the future. Of course, we intend to be reasonable and provide professional courtesy as you have here going forward.

From: Chelsea Till <[ctill@lynnllp.com](mailto:ctill@lynnllp.com)<<mailto:ctill@lynnllp.com>>>

Sent: Monday, December 23, 2024 3:13 PM

To: Sheasby, Jason <[JSheasby@irell.com](mailto:JSheasby@irell.com)<<mailto:JSheasby@irell.com>>>; Joshua Lang  
<[jlang@lynnllp.com](mailto:jlang@lynnllp.com)<<mailto:jlang@lynnllp.com>>>  
Cc: Love Greg <[Greg@stecklerlaw.com](mailto:Greg@stecklerlaw.com)<<mailto:Greg@stecklerlaw.com>>>; Proctor, Amy  
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<[judgestickney@stecklerlaw.com](mailto:judgestickney@stecklerlaw.com)<<mailto:judgestickney@stecklerlaw.com>>>; #Valtrus-Google [Int]  
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Subject: RE: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

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Yes, that was a typo. The next two motions we file.

We are in agreement.

Thanks.

CHELSEA TILL, Of Counsel  
Lynn Pinker Hurst & Schwegmann  
2100 Ross Avenue, Suite 2700  
Dallas, Texas 75201  
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From: Sheasby, Jason

<JSheasby@irell.com<mailto:JSheasby@irell.com<mailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com>>>

Sent: Monday, December 23, 2024 5:08 PM

To: Chelsea Till

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Joshua Lang

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Cc: Love Greg

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<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>; #Valtrus-Google [Int] <Valtrus-

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<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>; Proctor, Amy

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Case 3:22-cv-00066-L Document 216-2 Filed 12/27/24 Page 9 of 52 PageID 10418  
uinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>; Michael K. Hurst  
<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@l  
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<judgetstickney@stecklerlaw.com<mailto:judgetstickney@stecklerlaw.com<mailto:judgetstickney@steck  
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Google@irell.com<mailto:Valtrus-Google@irell.com<mailto:Valtrus-  
Google@irell.com%3cmmailto:Valtrus-Google@irell.com>>>; Gina Flores  
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quinnemanuel.com%3cmmailto:haihangwang@quinnemanuel.com>>>  
Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

It was the next two motions

From: Chelsea Till

<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>

Date: Monday, December 23, 2024 at 3:07 PM

To: Jason Sheasby

<JSheasby@irell.com<mailto:JSheasby@irell.com<mailto:JSheasby@irell.com%3cmmailto:JSheasby@ire  
ll.com>>>, Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com  
>>>

Cc: Love Greg

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Gre  
g@stecklerlaw.com>>>, "Proctor, Amy"

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.  
com>>>, Perlson David

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uinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>, "Michael K. Hurst"

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ynnllp.com>>>, "He-Schaefer, Connor" <che-schaefer@irell.com<mailto:che-

schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>>, Julia Simon  
<jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lyn  
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From: Sheasby, Jason

<JSheasby@irell.com<mailto:JSheasby@irell.com<mailto:JSheasby@irell.com%3cmailto:JSheasby@irell.com>>>

Sent: Monday, December 23, 2024 4:51 PM

To: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com>>>

Cc: Love Greg

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>; Proctor, Amy

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schaefer@irell.com<mailto:che-schaefer@irell.com%3cmailto:che-schaefer@irell.com>>>; Julia Simon <jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmailto:jsimon@lynnllp.com>>>; Chelsea Till

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valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmailto:qe-valtrus@quinnemanuel.com>>>; Stickney Judge Paul

<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>; #Valtrus-Google [Int] <Valtrus-

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<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmailto:davidperlson@quinnemanuel.com>>>; Michael K. Hurst  
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<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmailto:ctill@lynnllp.com>>>; Tonia Ashworth  
<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmailto:TAshworth@lynnllp.com>>>; Stickney Judge Paul  
<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>; #Valtrus-Google [Int] <Valtrus-Google@irell.com<mailto:Valtrus-Google@irell.com<mailto:Valtrus-Google@irell.com%3cmailto:Valtrus-Google@irell.com>>>; Gina Flores  
<gflores@lynnllp.com<mailto:gflores@lynnllp.com<mailto:gflores@lynnllp.com%3cmailto:gflores@lynnllp.com>>>; Wang Haihang  
<haihangwang@quinnemanuel.com<mailto:haihangwang@quinnemanuel.com<mailto:haihangwang@quinnemanuel.com%3cmailto:haihangwang@quinnemanuel.com>>>  
Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Josh.

i am afraid that proposal inadvertently left something out.

On tactic you have used in the past is to demand an excessive extension and then file a motion against us that you seek to either expedite or get in front of our motions.

so the forth stipulation is you grant us the same extension on the next motions you file if we ask.

Best

JS

On Dec 23, 2024, at 2:48 PM, Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com>>>> wrote:

Hi Greg

Thanks for speaking with me just now. Like we discussed, we accept your original proposal as written below.

Thank you

Josh

Sent from my Verizon, Samsung Galaxy smartphone

Get Outlook for



Case 3:22-cv-00066-L Document 216-2 Filed 12/27/24 Page 14 of 52 PageID 10423  
[Google@irell.com](mailto:Google@irell.com)<<mailto:Valtrus-Google@irell.com><<mailto:Valtrus-Google@irell.com><<mailto:Valtrus-Google@irell.com>>>>>; Gina Flores  
<[gflores@lynnllp.com](mailto:gflores@lynnllp.com)<<mailto:gflores@lynnllp.com><<mailto:gflores@lynnllp.com><<mailto:gflores@lynnllp.com>>>>>; Haihang Wang  
<[haihangwang@quinnemanuel.com](mailto:haihangwang@quinnemanuel.com)<<mailto:haihangwang@quinnemanuel.com><<mailto:haihangwang@quinnemanuel.com><<mailto:haihangwang@quinnemanuel.com>>>>>  
Subject: Re: Valtrus v. Google: Extension request for recently filed motions; Valtrus II Conference

Josh-

1. Valtrus will not agree to take off calendar the scheduling conference before Judge Scholer scheduled for January 8th in Valtrus II.
2. As to your request for an extension on the response to the motions to consolidate in Valtrus I and II, and Valtrus' Motion to Amend the Complaint in Valtrus I, Valtrus is willing to not oppose an extension from January 8th to January 22nd so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.
3. Valtrus is willing to not oppose an extension from January 2nd to January 16th for Google's response to the Amended complaint in Valtrus II so long as Google agrees not to use the agreement as a basis to delay the status conference on January 8th in Valtrus II. Please confirm.

Thanks,

Greg

From: Joshua Lang  
<[jlang@lynnllp.com](mailto:jlang@lynnllp.com)<<mailto:jlang@lynnllp.com><<mailto:jlang@lynnllp.com><<mailto:jlang@lynnllp.com>>>>>  
Date: Monday, December 23, 2024 at 12:41 PM  
To: Proctor, Amy  
<[AProctor@irell.com](mailto:AProctor@irell.com)<<mailto:AProctor@irell.com><<mailto:AProctor@irell.com><<mailto:AProctor@irell.com>>>>>, David Perlson  
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<[Greg@stecklerlaw.com](mailto:Greg@stecklerlaw.com)<<mailto:Greg@stecklerlaw.com><<mailto:Greg@stecklerlaw.com><<mailto:Greg@stecklerlaw.com>>>>>  
Cc: Michael K. Hurst

I am following up on the email below; I also called Greg this morning to discuss our requested extensions and left a message. Please let us know your position on our requested extensions today. Given the coming holidays, we intend to file motions requesting these extensions today. If we do not hear from you, we will mark Valtrus as opposed.

Thank you,  
Josh

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From: Joshua Lang

Sent: Friday, December 20, 2024 6:02 PM

To: Proctor, Amy

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>: David Perlson

<davidperlson@quinnemanuel.com<ma<mailto:AProctor@irell.com%3cmailto:AProctor@irell.com%3e%3e%3e;%20David%20Perlson%20%3cdavidperlson@quinnemanuel.com%3cma>mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmailto:davidperlson@quinnemanuel.com>>>; Greg Love

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Cc: Michael K. Hurst

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Counsel,

In reference to Valtrus's recent filings, Google seeks Valtrus's agreement to certain extensions given the volume of materials, the holidays, and travel plans of team members.

For Google responses to Valtrus's Motions to Consolidate in Valtrus I and Valtrus II and Valtrus's Motion

For Google's response to Valtrus II Amended Complaint, Google seeks an extension from January 2 to January 16.

Additionally, as you saw, the court set a scheduling conference in Valtrus II for January 8. Given that Google has moved to dismiss and that Valtrus has sought to consolidate Valtrus I and Valtrus II, Google suggests the parties jointly contact the court to take the January hearing in Valtrus II off calendar, pending rulings on these motions.

Given the upcoming holiday, please provide your position on these as soon as possible, preferably today.

Thanks,  
Josh

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Sent: Friday, December 20, 2024 10:09 AM

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Cc: Michael K. Hurst

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Counsel,

We disagree with your characterizations and assumptions. Valtrus provided a draft report as discussed. Although Google would not agree to any schedule for preparation of the parties' joint report, or commit to

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Subject: RE: Valtrus v. Google -- Joint

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Counsel, despite your assurances on Monday, what Plaintiff provided last night had little more than headings and list of subject matters to address, with little substance and very little in regards to Plaintiff's actual positions. Thus, we essentially had to draft an entirely new document today. Given so, we may well have further edits to the draft included herein, in addition to responding to Plaintiff's positions which we have not received.

As noted, it is clear that Plaintiff has already drafted its positions, so Valtrus should be able to provide a quick turnaround draft tomorrow, which will be needed if we are to file this jointly and on time Monday. Also, note that we drafted some of this anticipating that Valtrus will get into the detail on issues, such as those related to its pending motions to amend and consolidate. If Valtrus does not do so, Google will be happy to review its portions to shorten, but given the timeframe and Valtrus's refusal to provide positions with its draft, Google erred on the side of inclusion.

To the extent Valtrus would like to discuss the contents the statement, we are happy to do so. After you have reviewed, please provide an estimate in AM CT when we can expect a return draft.

Attached is a draft and a redline from what you sent.

David

From: Greg Love

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Sent: Thursday, December 19, 2024 9:58 AM

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Cc: Proctor, Amy

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y<mailto:innemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3e%3e%3e%20wrote:%0b%0bAmy,%20this%20is%20not%20consistent%20with%20what%20y>ou represented we would get from you in our call Monday, which you said would have Plaintiff's positions so that we could respond to them and go back and forth as needed, a process you also noted would take some time. Simultaneous exchange of positions of something like this, which you also did not suggest Monday and which we would not have agreed to, is unworkable and inefficient as, for example, it is not possible to respond to positions from the other party before you receive them.

In all events, it seems clear based on Mr. Franklund's email and your latest one, that Plaintiff has its positions ready, but is simply withholding them. We urge you to provide them immediately so we can hopefully work efficiently and cooperatively towards a timely, joint filing Monday, which Plaintiff's conduct is putting at risk.

David

From: Proctor, Amy

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Sent: Wednesday, December 18, 2024 10:11 PM

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Cc: Michael K. Hurst

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%0bHi%20David,%0b%0bOn> Monday, we said we would try to send  
the draft report shell within the next couple of days. I have attached that shell here. Please let us know  
when Google will be ready to simultaneously exchange its positions for each issue that calls for the  
parties' separate positions.

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>

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Subject: RE: Valtrus v. Google -- Joint

Stateme<maito:tecklerlaw.com%3cmaito:judgetstickney@stecklerlaw.com%3cmaito:judgetstickney@stecklerlaw.com%3cmaito:judgetstickney@stecklerlaw.com%3cmaito:judgetstickney@stecklerlaw.com%3e%3e%3e%3e%0bSubject:%20RE:%20Valtrus%20v.%20Google%20--%20Joint%20Stateme>nt Draft

Amy, following up on below. Please send the draft report now as Valtrus committed to do Monday. While we are in receipt of a separate email from your colleague Mr. Franklund, we cannot agree to a further schedule without seeing your draft, nor is this last-minute demand for agreement to a new schedule reasonable.

David

From: David Perlson

<davidperlson@quinnemanuel.com<maito:davidperlson@quinnemanuel.com<maito:davidperlson@quinnemanuel.com%3cmaito:davidperlson@quinnemanuel.com<maito:davidperlson@quinnemanuel.com%3cmaito:davidperlson@quinnemanuel.com%3cmaito:davidperlson@quinnemanuel.com>>>>

Sent: Wednesday, December 18, 2024 5:03 PM

To: Proctor, Amy

<AProctor@irell.com<maito:AProctor@irell.com<maito:AProctor@irell.com%3cmaito:AProctor@irell.com<maito:AProctor@irell.com%3cmaito:AProctor@irell.com%3cmaito:AProctor@irell.com>>>>; Greg Love

<Greg@stecklerlaw.com<maito:Greg@stecklerlaw.com<maito:Greg@stecklerlaw.com%3cmaito:Greg@stecklerlaw.com<maito:Greg@stecklerlaw.com%3cmaito:Greg@stecklerlaw.com%3cmaito:Greg@stecklerlaw.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<maito:MHurst@lynnllp.com<maito:MHurst@lynnllp.com%3cmaito:MHurst@lynnllp.com<maito:MHurst@lynnllp.com%3cmaito:MHurst@lynnllp.com%3cmaito:MHurst@lynnllp.com>>>>; Joshua Lang

<jlang@lynnllp.com<maito:jlang@lynnllp.com<maito:jlang@lynnllp.com%3cmaito:jlang@lynnllp.com<maito:jlang@lynnllp.com%3cmaito:jlang@lynnllp.com%3cmaito:jlang@lynnllp.com>>>>; Sheasby, Jason

Amy, on our call Monday you indicated you would be sending us a draft in the next day or two. Please send this evening.

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>>

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>, Greg Love

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>>, Joshua Lang

31

[EXTERNAL EMAIL from

aproctor@irell.com<mailto:aproctor@irell.com<mailto:aproctor@irell.com%3cmailto:aproctor@irell.com%3cmailto:aproctor@irell.com%3cmailto:aproctor@irell.com%3cmailto:aproctor@irell.com>>>]

Hi David,

We are looking into your request and will try to get approval from all necessary counsel and parties, but I don't expect that will be a quick process, especially with the holidays around the corner. We will keep you updated.

Kind regards,  
Amy

Amy E. Proctor (she/her) | Irell & Manella LLP  
1800 Avenue of the Stars, Los Angeles, CA 90067  
310.203.7961 |

[www.irell.com](http://www.irell.com)<<http://www.irell.com>>><<http://www.irell.com><<http://www.irell.com>>>><<http://www.irell.com><<http://www.irell.com>>>><<http://www.irell.com><<http://www.irell.com>>>><<http://www.irell.com><<http://www.irell.com>>>><e%3chttp://www.irell.com%3chttp://www.irell.com%3e%3e>



Counsel, on our meet and confer, Valtrus indicated it intends to seek leave to amend its complaint to, among other things, add KPI as a plaintiff. In connection with and to help us consider this request, please provide unredacted filings of the briefing in Valtrus v. SAP, Civil Action No. 2:24-cv-21 (SAP I) regarding SAP's motion to dismiss for lack of standing, Valtrus's request to amend the complaint to add KPI, and any request to consolidate SAP I with Valtrus v. SAP, Civil Action No. 2:24-cv-533 (SAP II). This would include the sealed motions in SAP I, Dkts Nos. 51, 56 and 91, and all sealed exhibits thereto, all sealed opposition and reply briefs with exhibits, and all sealed orders, including Dkt. 83. This appears to be information designated confidential by Valtrus so hopefully this should not be an issue. To be clear, at this time, we are requesting the sealed filings only, not publicly available redacted briefs, exhibits, and orders.

David

From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>>

Sent: Thursday, December 12, 2024 6:51 AM

To: David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>>; Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>>; jsheasby@irell.com<mailto:jsheasby@irell.com>; che-

schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>>>; Julia Simon

<jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com>>>>; Chelsea Till

<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>>; Tonia Ashworth

<TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com<mailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com%3cmmailto:TAshworth@lynnllp.com>>>>; QE-Valtrus <qe-

valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-

greg@stecklerlaw.com<mailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com%3cmmailto:greg@stecklerlaw.com>>>]

That time works for Valtrus.

<jsheasby@irell.com<mailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com>>>>, che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>>> <che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>>>, Julia Simon





@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>>

Date: Friday, December 6, 2024 at 7:35 AM

To: David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>>

Cc: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>>, Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>>, Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>>, jsheasby@irell.com<mailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com%3cmmailto:jsheasby@irell.com>>>>

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<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com%3cmmailto:ctill@lynnllp.com>>>>, Tonia Ashworth

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valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com>>>>, Judge Paul Stickney

<judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com<mailto:judgestickney@stecklerlaw.com%3cmmailto:judgestickney@stecklerlaw.com>>>>

Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

[EXTERNAL EMAIL from

greg@stecklerlaw.com<mailto:greg@stecklerlaw.com<mailto:greg@stecklerlaw.com%3cmmailto:greg@

David &amp; Michael-

In light of the court's order lifting the stay, we need to meet and confer regarding the joint management statement as outlined in Misc. Order 62. The Valtrus team is available December 16th for a conference call to discuss.

Can you or someone from your side be available December 16th to meet/confer?

Greg Love

Steckler Wayne Love, PLLC

107 East Main Street

Henderson, Texas 75652

903.212.4444

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On Nov 19, 2024, at 10:05 AM, David Perlson

<davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com<mailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com%3cmmailto:davidperlson@quinnemanuel.com>>>> wrote:

Yes that time works thanks.

From: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>>

Sent: Tuesday, November 19, 2024 7:29:14 AM

To: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com  
<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com%3cmailto:jlang  
@lynnllp.com>>>>; Amy Proctor

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MICHAEL K. HURST, Partner  
Board Certified – Civil Trial Law  
Texas Board of Legal Specialization

Lynn Pinker Hurst & Schwegmann  
Direct 214 981 3838





nlly.com>>>; Chelsea Till

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Tonia Ashworth

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Ashworth@lynll.com>>>; David Perlson

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valtrus@quinnemanuel.com%3cmailto:qe-valtrus@quinnemanuel.com>>>; Judge Paul Stickney

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lerlaw.com%3cmailto:judgestickney@stecklerlaw.com>>>

Subject: RE: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Tuesday between 2 and 4 CST?

MICHAEL K. HURST, Partner

Board Certified – Civil Trial Law

Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate

National Board of Trial Advocacy

Lynn Pinker Hurst & Schwegmann

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Top 100 Lawyers in Texas and DFW – Super Lawyers

Top Commercial Litigation Lawyer in DFW – Chambers & Partners

Lawyer of the Year – Best Lawyers (2021, 2023)

Best Lawyers Hall of Fame – D Magazine (2022)

<image001.jpg>

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Gre  
g@stecklerlaw.com>>>

Sent: Friday, November 15, 2024 7:56 AM

To: Michael K. Hurst

Monday doesn't work for us. Tuesday or Wednesday would be best.

On Nov 14, 2024, at 5:24 PM, Michael K. Hurst  
<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>> wrote:  
4:30 on Monday?

MICHAEL K. HURST, Partner

Board Certified – Civil Trial Law  
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate  
National Board of Trial Advocacy

Lynn Pinker Hurst & Schwegmann

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Top 100 Lawyers in Texas and DFW – Super Lawyers  
Top Commercial Litigation Lawyer in DFW – Chambers & Partners  
Lawyer of the Year – Best Lawyers (2021, 2023)  
Best Lawyers Hall of Fame – D Magazine (2022)

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On Nov 14, 2024, at 11:55 AM, Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>> wrote:

Michael-

Are you and your team available for a call next week to discuss?

Greg Love  
Steckler Wayne & Love PLLC  
East Texas Office  
903.212.4444

---

From: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmailto:MHurst@lynnllp.com>>>

Sent: Wednesday, October 30, 2024 4:53 PM

To: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmailto:Greg@stecklerlaw.com>>>  
Cc: Joshua Lang  
<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmailto:jlang@lynnllp.com>>>; Amy Proctor  
<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmailto:AProctor@irell.com>>>;  
jsheasby@irell.com<mailto:jsheasby@irell.com><jsheasby@irell.com<mailto:jsheasby@irell.com<mailto:jsheasby@irell.com%3cmailto:jsheasby@irell.com%3e%3cjsheasby@irell.com%3cmailto:jsheasby@irell.com>>>; che-schaefer@irell.com<mailto:che-schaefer@irell.com><che-schaefer@irell.com<mailto:che-schaefer@irell.com<mailto:che-schaefer@irell.com%3cmailto:che-schaefer@irell.com%3e%3cche-schaefer@irell.com%3cmailto:che-schaefer@irell.com>>>; Julia Simon  
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<ctill@lynnllp.com<mailto:ctill@lynnllp.com<mailto:ctill@lynnllp.com%3cmailto:ctill@lynnllp.com>>>; Tonia Ashworth  
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Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Greg, I hope you're well. Now that the Court granted our extension to file a responsive pleading, we would like to know how Valtrus intends to proceed with this case so that we can respond accordingly. Thank you and regards,

Michael

MICHAEL K. HURST, Partner  
Board Certified – Civil Trial Law  
Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate  
National Board of Trial Advocacy

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Top 100 Lawyers in Texas and DFW – Super Lawyers

Top Commercial Litigation Lawyer in DFW – Chambers & Partners

Lawyer of the Year – Best Lawyers (2021, 2023)

Best Lawyers Hall of Fame – D Magazine (2022)

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On Oct 18, 2024, at 3:37 PM, Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>> wrote:

Thanks Michael. Valtrus agrees to the additional 15 days as a professional courtesy, and hopes Google will extend the same to Valtrus if the need arises. Have a good weekend.

Greg Love

Steckler Wayne Love, PLLC

107 East Main Street

Henderson, Texas 75652

903.212.4444

[www.stecklerlaw.com](http://www.stecklerlaw.com)<<http://www.stecklerlaw.com>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><<http://www.stecklerlaw.com><<http://www.stecklerlaw.com>>>><e%3chttp://www.stecklerlaw.com/%3chttp://www.stecklerlaw.com/%3e%3e>

On Oct 18, 2024, at 4:34 PM, Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>> wrote:

Thanks Greg. To answer you, certainly the fact that we still don't know how y'all plan to proceed, along with the complicated record of the motions to dismiss and procedural motions in the other cases that we would like to review, and the apparent lack of any urgency would support our request. Again, I would really appreciate the courtesy of the additional 15 days. Thanks, Greg.

Michael

MICHAEL K. HURST, Partner

Board Certified – Civil Trial Law

Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate  
National Board of Trial Advocacy

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Top 100 Lawyers in Texas and DFW – Super Lawyers  
Top Commercial Litigation Lawyer in DFW – Chambers & Partners  
Lawyer of the Year – Best Lawyers (2021, 2023)  
Best Lawyers Hall of Fame – D Magazine (2022)

<image001.jpg>

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>

Sent: Friday, October 18, 2024 12:55 PM

To: Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>>

Cc: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>; Amy Proctor

<AProctor@irell.com<mailto:AProctor@irell.com<mailto:AProctor@irell.com%3cmmailto:AProctor@irell.com>>>; jsheasby@irell.com<mailto:jsheasby@irell.com>; che-schaefer@irell.com<mailto:che-

schaefer@irell.com<mailto:che-schaefer@irell.com%3cmmailto:che-schaefer@irell.com>>; Julia Simon <jsimon@lynnllp.com<mailto:jsimon@lynnllp.com<mailto:jsimon@lynnllp.com%3cmmailto:jsimon@lynnllp.com>>>; Chelsea Till

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valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com<mailto:qe-valtrus@quinnemanuel.com%3cmmailto:qe-valtrus@quinnemanuel.com>>>

Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Michael-

Disregarding your mischaracterizations, a few questions so we can properly consider your request:

## Why do you need 45 days?

### What would prevent you from filing a responsive pleading in 30 days?

Greg Love

Steckler Wayne Love, PLLC

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Henderson, Texas 75652

903.212.4444

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(Mobile Device)

On Oct 18, 2024, at 1:45 PM, Michael K. Hurst

<MHurst@lynnllp.com<mailto:MHurst@lynnllp.com<mailto:MHurst@lynnllp.com%3cmmailto:MHurst@lynnllp.com>>> wrote:

Greg, thank you for agreeing to at least 30 days. However, I am again respectfully requesting 45 days. We had been trying to reach you many times to get an answer to our simple request for an extension of 45 days, then only under threat of motion practice do you respond saying you agree to only 30 days. As you know, in the complaint Valtrus indicates that it does even intend to proceed with this case, but rather will seek to stay it. And despite our repeated requests for an answer as to how, if at all, Valtrus intends to proceed in this case you you haven't told us this either. This makes your refusal to agree to 45 days seem all the more unreasonable and confusing. Please let me know. Thank you for your courtesies,  
Michael

MICHAEL K. HURST, Partner

Board Certified – Civil Trial Law

Texas Board of Legal Specialization

Board Certified – Civil Trial Advocate

National Board of Trial Advocacy

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## Top 100 Lawyers in Texas and DFW – Super Lawyers

## Top Commercial Litigation Lawyer in DFW – Chambers & Partners

Lawyer of the Year – Best Lawyers (2021, 2023)

<image001.jpg>

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From: Greg Love

<Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com<mailto:Greg@stecklerlaw.com%3cmmailto:Greg@stecklerlaw.com>>>

Sent: Friday, October 18, 2024 6:11 AM

To: Joshua Lang

<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>>

Cc: Amy Proctor

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Subject: Re: Civil Action No. 3:24-cv-1795-G - Valtrus/KPI v. Google

Josh,

Valtrus will not oppose an extension request of 30 days.

Greg Love

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On Oct 17, 2024, at 9:06 PM, Joshua Lang  
<jlang@lynnllp.com<mailto:jlang@lynnllp.com<mailto:jlang@lynnllp.com%3cmmailto:jlang@lynnllp.com>>> wrote:

Good Evening Counsel,

I write concerning our attempts to confer on this matter. Last week, I reached out to Mr. Love's office to discuss an extension of our deadline to respond to the complaint and to inquire on how Plaintiffs intend to proceed with this second matter, given the related matter presently pending (and stayed) before Chief Judge Godbey (Civil Action No. 3:22-cv-00066-N). Mr. Love and I could not connect, and I left a message with his receptionist. This week, although Mr. Love and I were able to connect on Tuesday, he indicated that he needed to speak with his team at Irell. Yesterday, he indicated that he was able to connect with his team and expected to have a response to us today. We still have not received a response.

Accordingly, tomorrow, we will file a motion to extend our deadline to respond to the complaint. We will file the motion as an opposed motion unless we hear otherwise. Additionally, given the fact that that our response deadline is quickly approaching, we intend to mark the motion as expedited.

Thank you,  
Josh

--  
JOSHUA D. LANG, Attorney  
Lynn Pinker Hurst & Schwegmann, LLP  
2100 Ross Avenue, Suite 2700  
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>

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